

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Mailing Online Service

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Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-23-24)
(December 11, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

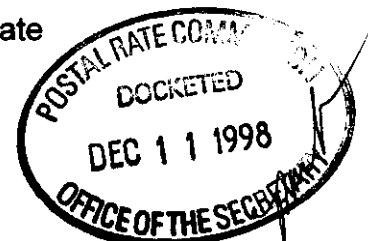
Respectfully submitted,

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Gail Willette
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OCA/USPS-23. Please refer to the report of the system developer (Tracor) found at Tr. 6/1382.

- a. The report states, "The system could determine for each batch site where a user's mail was destined and the number of pieces that qualify for automation rates. This *approach* is fraught with at least three major shortcomings." [Emphasis added.] Since the system's capability to track the destination and number of qualifying mailpieces is separate from the uses to which such information could be put, please describe in detail the "approach" referred to in the quote.
- b. The Tracor report identifies as a "shortcoming" "[t]he system resources required to determine these discounts." Please identify the discounts referenced in the quote.
- c. The Tracor report states, "This procedure would also adversely affect the amount of time required to complete the daily batch process for all submitted jobs."
 - i. Please describe in detail the "procedure" referred to in the quote.
 - ii. What is the current average amount of time required to complete the daily batch process for all submitted jobs during the market test?
 - iii. What is the estimated amount of time required to complete the daily batch process for all submitted jobs during each year of the experiment as proposed by the Postal Service?
 - iv. Please provide the increase in time required to complete the daily batch process for all submitted jobs as a result of the "procedure" referred to in the quote.

- d. The Tracor report states, "The developer's estimate is that the amount of physical time required to complete this process would increase by a factor of 2 to 3 times." Please confirm that the "amount of physical time required to complete this process" refers to the estimated time of the developer in establishing the approach described in response to part (a) of this interrogatory. If you do not confirm, please describe in detail the "process" referred to in the quote.

OCA/USPS-24. Please refer to Postal Service witness Plunkett's response to Notice of Inquiry No.1, Issue 1, at Tr. 5/1125, where he states:

The existing automation basic categories are most often applied to the residuum of larger mailings wherein most pieces qualify for deeper discounts. In such cases, the number of pieces to which the automation basic rate is applied may be well below the threshold minimums.


- a. Does the phrase, "residuum of larger mailings," mean that *all* pieces that do not "qualify for deeper discounts" receive the automation basic discount? If not, under what circumstances would residual pieces of a mailing otherwise qualifying for deeper discounts pay single-piece rates?
- b. Please assume a mailing consisting of 1,000 pieces, with 500 presorted to 5-digit and 400 presorted to 3-digit. Would the remaining 100 pieces receive the Automation Basic discount? How would the depth of sort for this mailing appear on a Qualification Report for Mailing Online? For a mailing submitted in hard copy?
- c. Please confirm that because the above 1,000-piece mailing exceeds the minimum volume requirements for Automation Basic, and "most of the pieces

qualify for deeper discounts," the residuum of 100 mailpieces would always qualify for the Automation Basic discount if submitted in hard copy. If you do not confirm, please explain.

- d. Please assume a mailing consisting of 1,000 pieces, with 900 presorted to carrier route. Would the remaining 100 pieces automatically receive the Automation Basic discount? How would the depth of sort for this mailing appear on a Qualification Report for Mailing Online? For a mailing submitted in hard copy?
- e. Please confirm that because the above 1,000-piece mailing exceeds the minimum volume requirements for Automation Basic, and "most of the pieces qualify for deeper discounts," the residuum of 100 pieces would always qualify for the Automation Basic discount if submitted in hard copy. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
December 11, 1998